

1 Bruce Berline  
2 BERLINE & ASSOCIATES, LLC  
3 Second Floor, Macaranas Building  
4 PO Box 5682 CHRB  
5 Saipan, MP 96950  
6 Tel: (670) 233-3663  
7 Fax: (670) 233-5262  
8 Email: bruce@saipanlaw.com

9  
10 Aaron Halegua  
11 AARON HALEGUA, PLLC  
12 154 Grand Street  
13 New York, New York 10013  
14 Tel: (646) 854-9061  
15 Email: ah@aaronhalegua.com

16 Attorneys for Plaintiffs

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19 **IN THE UNITED STATES DISTRICT COURT**  
20 **FOR THE NORTHERN MARIANA ISLANDS**

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22 TIANMING WANG, *et. al.*,

23 Plaintiffs,

24 v.

25 GOLD MANTIS CONSTRUCTION  
26 DECORATION (CNMI), LLC, *et. al.*,

27 Defendants.

28 Case No. 18-cv-0030

29 **NOTICE OF MOTION**

30 Hearing Date: April 16, 2020

31 Hearing Time: 10:00 am

32 Judge: Hon. Ramona V. Manglona

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34 **PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANT IPI**

35 Plaintiffs move the Court, based on the facts set forth in the Declaration of Aaron  
36 Halegua, dated March 10, 2020 and all exhibits attached thereto, pursuant to Fed. R. Civ. P.  
37(b)(2), to impose sanctions against Defendant Imperial Pacific International (CNMI), LLC's  
38 ("IPI") for its violation of multiple discovery orders by this Court.

IPI has violated this Court's initial order to produce all discovery by January 13, 2020 (ECF Nos. 61, 79), and now also violated the stipulation so-ordered by this Court requiring it to produce all discovery by February 24, 2020 (ECF Nos. 77, 78).

Accordingly, Plaintiffs request that the Court issue an order pursuant to Fed. R. Civ. P. 37(b)(2) that: (i) directs IPI to produce all discovery and file a certifying declaration upon doing so; (ii) treats IPI's failure to obey this Court's orders as a contempt of court; (iii) imposes a civil contempt sanction of \$5,000 per day payable to the Court until IPI complies with those orders; (iv) warns IPI that any further noncompliance will result in harsher sanctions, up to and including striking its affirmative defenses, striking its pleadings, or entering a default judgment; (v) awards Plaintiffs' attorneys' fees in connection with IPI's disobedience of this Court's prior discovery orders; and (vi) imposes any other sanctions that the Court deems justified.

Respectfully submitted,

/s/

Aaron Halegua (*admitted pro hac vice*)  
AARON HALEGUA, PLLC  
154 Grand Street  
New York, New York 10013  
Tel: (646) 854-9061  
Email: ah@aaronhalegua.com

Bruce Berline  
BERLINE & ASSOCIATES, LLC  
Second Floor, Macaranas Building  
PO Box 5682 CHRB  
Saipan, MP 96950  
Tel: (670) 233-3663  
Fax: (670) 233-5262  
Email: bruce@saipanlaw.com

Attorneys for Plaintiffs